Sanga, Ravi

From: Tom Colligan <Tom.Colligan@floydsnider.com>
Sent: Wednesday, June 22, 2016 7:57 AM
To: McCrea, Rachel (ECY)
Cc: Sanga, Ravi; Ernst, William D; Dyer, Miles; 'Daniel Balbiani'; 'Dee Gardner'; Wright, Robert (ECY)
Subject: Re: JFOS Project Storm water clarification

Thanks Rachel. Our plan includes quite a few measures active measures to control seepage, I could email you our work plan if you are interested in the details, let me know. We will keep you informed of the construction schedule as well.

TOM

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From: McCrea, Rachel (ECY) <rmcc461@ECY.WA.GOV>
Sent: Tuesday, June 21, 2016 11:00 AM
To: Tom Colligan
Cc: Sanga, Ravi; Ernst, William D; Dyer, Miles; 'Daniel Balbiani'; 'Dee Gardner'; Wright, Robert (ECY)
Subject: RE: JFOS Project Storm water clarification

Hello Tom et al –

Thanks for your email summary.

Given that the project is not proposing nor planning to discharge dewatering water (or any water) to waters of the state, and the project does not result in 1 acre or more of land disturbing activity, we do concur that coverage under a Construction Stormwater Permit would not be required and thus the related CERCLA substantive compliance does not need to include a construction SWPPP nor stormwater discharge monitoring. Your plans already include TESC measures. Your plans also address the discharge of dewatering water and any stormwater that is collected in the decon area to the sanitary sewer after treatment and in accordance with King County requirements. I understand that any rainfall falling on the disturbed land will stay within the excavation.

We do have two recommendations for your and Ravi's consideration, based on our experience:

- Should a spill occur on the project, or a sheen or excessive turbidity be observed in the river, please report it to Ecology's ERTS line at 425-649-7000 (in addition to any required reporting to EPA etc.).

- Make sure your plans address potential leakage to the river via sheet pile joints. Do you know if this sheet pile has joints that have been sealed already? Observe for potential leakage as you excavate and during construction activities. For example, if higher than normal river turbidity is observed near at river side of the sheet pile wall, this could indicate leakage. Make sure you have a backup plan to address this potential unplanned discharge to the river.

And please let us know when you start construction so we could stop by and observe as time allows.
Thanks,
Rachel

Rachel McCrea | Lead Water Quality Planner for the Lower Duwamish | Municipal Stormwater Specialist Department of Ecology NWRO | Water Quality Program | 425-649-7223

From: Tom Colligan [mailto:Tom.Colligan@floydsnider.com]
Sent: Friday, June 17, 2016 12:38 PM
To: McCrea, Rachel (ECY) <rmcc461@ECY.WA.GOV>
Cc: Sanga, Ravi <Sanga.Ravi@epa.gov>; Ernst, William D <william.d.ernst@boeing.com>; Dyer, Miles <mdyer@JorgensenForge.com>; 'Daniel Balbiani' <dbalbiani@pesenv.com>; 'Dee Gardner' <dgardner@soundearthinc.com>
Subject: JFOS Project Storm water clarification

Rachel, great to talk to you today about the JFOS (Jorgensen Forge Outfall Project). I think this is a good recap -

1. The project will most likely start in the month of August, and last for about 3 weeks (I say "most likely" because we still have not yet selected a contractor, but this is the schedule we are expected to be under).
2. The project size where the sheetpile will be placed and contaminated soil excavated within is about 1,300 square feet.
3. The overall area for the contractor to set equipment, etc. is around 4,000 square feet.
4. The project area is not paved (with the exception of Boeing property lying adjacent to the project area).
5. Construction dewatering will be required and a wastewater treatment plant will be set up on the site and will treat wastewater for discharge to the King County sewer system under a permit authorization. This treatment system will be set up for the entire duration of the project and will also treat other waters generated, such as decon water.
6. The project will NOT discharge any water (waste or storm, or even potable) to the Duwamish, or any other "waters of the State".
7. TESC measures consistent with the Stormwater Management Manual for Western Washington are specified in the project bid documents and apply to all areas of the site, include any excavation areas, staging areas, stockpiles, and equipment storage areas.
8. TESCs will be monitored daily, and especially so if we get a rain event, even on a weekend.

So, based on the above, it appears that coverage under the Construction Stormwater Permit is probably not required, so therefore a SWPPP is not a required document. Let me know if you agree with this, thanks Rachel!

Tom Colligan L.H.G.
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